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Rimini Street, Inc., and Counterdefendant
Seth Ravin

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RIMINI STREET, INC., a Nevada corporation;
Plaintiff,

v.
ORACLE INTERNATIONAL CORPORATION,
a California corporation,
Defendant.

Case No 2:14-cv-01699 LRH CWH

**STIPULATION AND [PROPOSED]
ORDER ENTERING A REVISED CASE
SCHEDULE
(FOURTH REQUEST)**

ORACLE AMERICA, INC., a Delaware
corporation, *et al.*,

Counterclaimants,

v.
RIMINI STREET, INC., a Nevada corporation, *et
al.*,

Counterdefendants.

1 Plaintiff and Counterdefendant Rimini Street, Inc. and Counterdefendant Seth Ravin
2 (together, “Rimini”) and Counterclaimant Oracle America, Inc. and Defendant and
3 Counterclaimant Oracle International Corp. (together, “Oracle”; all parties collectively,
4 “Parties”) jointly submit this Stipulation and [Proposed] Order (Fourth Request).

5 WHEREAS, the Court entered an order revising the case schedule on June 2, 2016 (the
6 “Current Case Schedule”). ECF No. 227.

7 WHEREAS, the Parties have submitted a Joint Status Report in advance of the status
8 conference scheduled for December 16, 2016. *See* ECF No. 353.

9 WHEREAS, in the Joint Status Report, Rimini proposes an extension to the Current Case
10 Schedule (the “Proposed Revised Case Schedule”). *See* ECF No. 353.

11 WHEREAS, Oracle does not oppose the Proposed Revised Case Schedule, provided that
12 the number of party depositions each side may conduct be increased to 25 depositions per side,
13 and that the number of document custodians each side may name be set at 50 custodians per side.

14 WHEREAS, contingent on the Court granting the Proposed Revised Case Schedule,
15 Rimini agrees to increase the number of party depositions and to set the number of document
16 custodians as set forth above.

17 WHEREAS, under the current meet and confer schedule previously ordered by the Court,
18 the Parties are required to exchange issue letters by 3:00 p.m. PT every Monday and to exchange
19 response letters by 3:00 p.m. PT every Wednesday, *see* ECF No. 167 at 5:11-17, after which the
20 Parties have chosen to regularly participate in telephonic meet and confers on Thursday.

21 WHEREAS, the Parties seek to change the frequency of this meet and confer process
22 from every week to a frequency of every two weeks, and thus propose that beginning the week of
23 December 19, 2016, and every two weeks thereafter, the Parties will continue to comply with the
24 process that is currently in place (*i.e.*, an exchange of letters on Monday and Wednesday, and a
25 telephonic meet and confer on Thursday), subject to change by mutual agreement of the parties.

26 THEREFORE, the Parties respectfully request that the Court order that the case schedule
27 be revised in accordance with the Proposed Revised Case Schedule outlined below:

28

Event	Current Deadline	Parties' proposal
Last date to file interim status report	December 19, 2016	November 28, 2017
Close of fact discovery	April 13, 2017	February 28, 2018
Last date to file motions to compel related to fact discovery	May 15, 2017	March 28, 2018
Last date for affirmative expert disclosures	June 2, 2017	April 18, 2018
Last date to disclose rebuttal experts	July 21, 2017	June 6, 2018
Close of expert discovery	August 28, 2017	July 18, 2018
Last date to file dispositive motions	October 6, 2017	August 15, 2018
Last date to file joint pretrial order	November 13, 2017	September 19, 2018

The Parties also respectfully request that the Court order that beginning the week of December 19, 2016, and every two weeks thereafter, the Parties will exchange issue letters by 3:00 p.m. PT on Monday and to exchange response letters by 3:00 p.m. PT on Wednesday, subject to change by mutual agreement of the parties.

DATED: December 13, 2016

GIBSON, DUNN & CRUTCHER LLP

MORGAN, LEWIS & BOCKIUS LLP

By: _____ /s/ Eric D. Vandevelde
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Attorneys for Plaintiff and Counterdefendant
Rimini Street, Inc. and Counterdefendant Seth
Ravin

By: _____ /s/ Thomas S. Hixson
Thomas S. Hixson
Attorneys for Counterclaimant Oracle
America, Inc. and Defendant and
Counterclaimant Oracle International
Corporation

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2 **IT IS SO ORDERED:**
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5 Hon. Carl W. Hoffman
6 United States Magistrate Judge
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Dated: _____, 2016

ATTESTATION OF FILER

The signatories to this document are Eric D. Vandevelde and me, and I have obtained Mr. Vandevelde's concurrence to file this document on his behalf.

DATED: December 13, 2016 MORGAN, LEWIS & BOCKIUS LLP

Thomas S. Hixson

Thomas S. Hixson
Attorneys for Counterclaimant Oracle America,
Inc. and Defendant and Counterclaimant Oracle
International Corporation